

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

NOBODY

)
)
)
)
)
)
)

No. 1:21-cr-00041-05-JL

ASSENTED TO MOTION TO AMEND CONDITIONS OF RELEASE

COMES NOW THE DEFENDANT, NOBODY, by and through the undersigned counsel, and requests that certain conditions of the Court's Order, dated February 3, 2022, be further modified. As grounds for and in support of this motion, Nobody states as follows:

- (1) Nobody awaits trial; anticipated to begin November 1, 2022.
- (2) Nobody was released from custody on or about September 1, 2021 with conditions that were subsequently modified to permit him to engage in limited communications with Defendants Freeman and DiMezzo, but continue to restrict the Nobody's contact with Mr. Mark Edgington. ECF No. 129.
- (3) On or about February 25, 2022, this Court granted an assented to motion modifying the conditions of release permitting limited contact between co-defendant Ian Freeman and Mr. Edgington. ECF No. 130.
- (4) Nobody has substantially complied with the conditions of pretrial release as set forth by this Court, and he would like to engage in contact with Mr. Edgington in the same or similar capacity as he is presently permitted to have contact with co-defendants Freeman and DiMezzo.
- (5) Mr. Edgington has not requested for the enforcement of a no contact order, and it is the opinion and belief of Nobody that Mr. Edgington would welcome contact.

- (6) No allegations of intimidation or witness tampering has been asserted.
- (7) Prior to the instant action and related restriction on communication, Nobody and Mr. Edgington were friends and worked closely together on the Free Talk Live production for at least 12 years. Moreover, each of their participation on Free Talk Live is essential to the essential production of the show.
- (8) Counsel for Nobody has contacted Georgiana L. MacDonald, Esq. of the U.S. District Attorney's Office who has indicated she does not object to the granting of this motion.
- (9) No legal memorandum accompanies this motion as the relief requested is fully set forth herein.
- (10) If the Court is not inclined to grant this motion, then a hearing is requested on this matter.

WHEREFORE, the parties respectfully request this Honorable Court to amend Nobody's conditions of release to allow him:

- (1) To be present in person at the physical location of 73 Leverett Street, Keene, New Hampshire, for the purposes of hosting and broadcasting Free Talk Live for the duration of the broadcast plus set-up and tear-down time of 30 minutes before and after the show, together with Mark Edgington and invited guests, as applicable.
- (2) To co-host the Free Talk Live show together with Mark Edgington.
- (3) To talk about any subject during these times requested except the pending charges.
- (4) To communicate with Mark Edgington at any time, in person, by email, or by messaging regarding the Free Talk Live broadcast and communications platform, including for discussion related to technology, staffing, content, bookkeeping and accounting, finance,

software development, listener base, affiliate network, and other matters reasonably related to the Free Talk Live broadcast and communications platform.

- (5) Nobody will provide advance notice to his pretrial services officer regarding contact as permitted in (A), (B), or (D) per the direction of the pretrial services officer.
- (6) All other conditions of release remain the same.

This 18th day of March 2022

Respectfully submitted,

/s/ Patrick Richard

Patrick Richard
attyrichard@hotmail.com
Law Office of Patrick Richard
11 Kearney Sq.
Lowell, MA 01852
978-458-4279
Attorney for Nobody

/s/ Anessa Allen Santos

Anessa Allen Santos
anessa@intellilaw.io
IntelliLaw
14620 Black Quill Dr.
Winter Garden, FL 34787
239-595-3794
Attorney for Nobody – *Pro Hac Vice*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served by electronic service, on March 18, 2022, on all counsel or parties of record on the service list.

/s/ Patrick Richard

Patrick Richard

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

NOBODY

)
)
)
)
)
)

No. 1:21-cr-00041-05-JL

ORDER AMENDING CONDITIONS OF RELEASE FOR NOBODY

The parties having reached agreement on the pending motions to amend the conditions of release for Nobody, the conditions of release are hereby amended to allow Nobody:

- (1) To be present in person at the physical location of 73 Leverett Street, Keene, New Hampshire, for the purposes of hosting and broadcasting Free Talk Live for the duration of the broadcast plus set-up and tear-down time of 30 minutes before and after the show, together with Mark Edgington and invited guests, as applicable.
- (2) To co-host the Free Talk Live show together with Mark Edgington.
- (3) To talk about any subject during these times requested except the pending charges.
- (4) To communicate with Mark Edgington at any time, in person, by email, or by messaging regarding the Free Talk Live broadcast and communications platform, including for discussion related to technology, staffing, content, bookkeeping and accounting, finance, software development, listener base, affiliate network, and other matters reasonably related to the Free Talk Live broadcast and communications platform.
- (5) Nobody will provide advance notice to his pretrial services officer regarding contact as permitted in (A), (B), or (D) per the direction of the pretrial services officer.
- (6) All other conditions of release remain the same.

SO ORDERED

Date:

Hon. Joseph N. Laplante
United States District Judge